REMARKS

Claims 35-58 are pending in this application. By this Amendment, Figs. 1 and 2 are amended as the Examiner requested. Claims 1-34 are canceled, and new claims 35-58 are added. No new matter is added. Reconsideration of the application is respectfully requested.

The Office Action objects to Figs. 1 and 2. Figs. 1 and 2 are amended as requested by the Examiner. Withdrawal of the objection of Figs. 1 and 2 is respectfully requested.

The Office Action rejects claims 1, 12, 13, 19, 22-25 and 28-32 under 35 U.S.C. §102(b) over U.S. Patent No. 3,443,151 to Myers et al. This rejection is moot with respect to the canceled claims 1, 12, 13, 19, 22-25 and 28-32, and is respectfully traversed with respect to new claims 35-58 where applicable.

The Office Action admits that Myers does not disclose or suggest a driver circuit comprising storage capacitors. See the Office Action at page 4. Thus, Myers does not disclose or suggest a driver circuit comprising a storage capacitor and a current driven element disposed between a n-channel transistor and a p-channel transistor, as recited in claims 35-58. Therefore, Myers does not disclose each and every element recited in claims 35-58.

For at least the above reasons, withdrawal of the rejection of claims 35-58, where applicable, under 35 U.S.C. §102(b) is respectfully requested.

The Office Action rejects claims 2, 3, 14 and 15 under 35 U.S.C. §103(a) over Myers in view of U.S. Patent No. 6,011,532 to Yanai et al. This rejection is moot with respect to the canceled claims 2, 3, 14 and 15, and is respectfully traversed with respect to new claims 35-58 where applicable.

Yanai discloses n-channel and p-channel transistors comprising polysilicon thin-film transistors. See col. 6, lines 55-64. Yanai does not disclose or suggest a driver circuit comprising a storage capacitor, and a current driven element disposed between an n-channel

transistor and a p-channel transistor, as recited in claims 35-58. Therefore, Yanai does not supply the subject matter admitted above as lacking in Myers.

For at least the above reasons, the combination of Myers and Yanai does not disclose or suggest the subject matter recited in claims 35-58. Withdrawal of the rejection of claims 35-58, where applicable, is respectfully requested.

The Office Action rejects claims 4, 11, 16, 20, 21, 26 and 27 under 35 U.S.C. §103(a) over Myers in view of U.S. Patent No. 5,714,968 to Ikeda. This rejection is moot with respect to the canceled claims 4, 11, 16, 20, 21, 26 and 27, and is respectfully traversed with respect to new claims 35-58 where applicable.

As discussed above, the Office Action admits that Myers does not disclose or suggest a driver circuit comprising storage capacitors. However, the Office Action asserts that Ikeda discloses storage capacitors. The Office Action further asserts that it would have been obvious to combine Myers and Ikeda. Applicant respectfully submits that one of ordinary skill in the art would not have been motivated to combine Myers and Ikeda.

Myers discloses a circuit where it is crucial that the n-channel and the p-channel transistors have a common voltage source, i.e., input B. See Fig. 4 and col. 4, lines 22-39. This provides a narrow voltage range for controlling the current supply to the electro-luminescent device 16'. See Fig. 4, and col. 4, lines 3-11. The electroluminescent element 16' is located between the n-channel and the p-channel transistors 20' and 26' such that the current flowing through the electroluminescent element and the n-channel and the p-channel transistors is the same. See Fig. 4.

Ikeda discloses a device in which two current controlling transistors 16 and 17 are connected to two different data lines 12 and 13, respectively. See Fig. 9 and col. 8, lines 16-26. The electroluminescent element 1 is arranged in parallel with the current controlling transistors 16 and 17, such that the current flowing through the

electroluminescent 1 may be different from that passing through the current controlling transistor 16 or the current controlling transistor 17. Thus, the structural arrangement of Ikeda is fundamentally different from that of Myers.

Furthermore, Ikeda's device is arranged to use different currents so as to avoid the problem of variation in characteristics of the current controlling transistors. See col. 2, lines 1-6, and col. 6, lines 16-21. Such a purpose is fundamentally different from that of the device disclosed in Myers which is for a selective control to achieve an electrical peaking characteristic. See col. 2, lines 13-15 of Myers.

In view of the above, one of ordinary skill in the art would not have been motivated to combine Myers and Ikeda. In particular, a combination of Myers and Ikeda would render Myers' device inoperative because the combination would require Myers' electroluminescent element to be arranged in parallel to, instead of in series with, the current controlling transistors. Also, such a combination would require render Myers' device inoperative because it would Myers' transistors to be connected to different data lines, instead of a common point.

Likewise, the asserted combination of Myers and Ikeda would render Ikeda's device inoperative because such a combination would require Ikeda's electroluminescent element to be arranged in series with the current controlling transistors, defeating Ikeda's purpose of having an electroluminescent element that is not influenced by the fluctuation of the characteristics of the transistors. Also, such a combination would require Ikeda's current controlling transistors to be connected to a common point, instead of two different data lines.

The Office Action appears to be engaged in impermissible hindsight reconstruction by using the present application as a road map to pick and choose features out of the prior art. Thus, the Office Action has failed to bear its burden to establish a *prima facie* case of obviousness, because it has failed to show any motivation for combining Myers and Ikeda.

For at least the above reasons, withdrawal of the rejection of claims 35-58, where applicable, is respectfully requested.

The Office Action rejects claims 5-10, 17 and 18 under 35 U.S.C. §103(a) over Myers and Ikeda and further in view of the admitted prior art. This rejection is moot with respect to the canceled claims 5-10, 17 and 18, and is respectfully traversed with respect to new claims 35-58 where applicable.

As discussed above, one of ordinary skill in the art would not have been motivated to combine Myers and Ikeda. Thus, one of ordinary skill in the art would not have been motivated to combine the admitted prior art with the combination of Myers and Ikeda. Accordingly, withdrawal of the rejection of claims 35-58, where applicable, is respectfully requested.

In view of the foregoing, it is respectfully submitted that this application is in condition for allowance. Favorable reconsideration and prompt allowance of claims 35-58 are earnestly solicited.

Should the Examiner believe that anything further would be desirable in order to place this application in even better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number set forth below.

Respectfully submitted,

James A. Oliff
Registration No. 27,075

Gang Luo
Registration No. 50,559

JAO:GXL/sqb

Attachments:
Petition for Extension of Time
Replacement Sheet

Date: December 2, 2003

OLIFF & BERRIDGE, PLC
P.O. Box 19928
Alexandria, Virginia 22320
Telephone: (703) 836-6400

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